

1 **Marquis Aurbach Chtd.**

2 Chad F. Clement, Esq.

2 Nevada Bar No. 12192

3 Alexander K. Calaway, Esq.

3 Nevada Bar No. 15188

4 10001 Park Run Drive

4 Las Vegas, Nevada 89145

5 Telephone: (702) 382-0711

5 Facsimile: (702) 382-5816

6 cclement@maclaw.com6 acalaway@maclaw.com7 *Attorneys for Defendants*10 BLUE WATER PETROLEUM CORP., a
11 Nevada corporation,

12 Plaintiff,

13 vs.

14 ATAKAM GROUP INC., a Wyoming
15 Corporation, ANDREW OSICHNUK, aka
16 ANDREI OSICHNUK, an individual,
17 ALEXANDER DEKHTYAR, an individual; and
18 DOES 1-10, inclusive,

19 Defendants.

Case No.: 3:24-cv-00203-LRH-CSD

STIPULATION AND (PROPOSED)
ORDER TO EXTEND DEFENDANTS'
DEADLINE TO RESPOND TO
COMPLAINT
(FIRST REQUEST)

Defendants Atakam Group Inc. (“Atakam”), Andrew Osichnuk aka Andrei Osichnuk (“Osichnuk”), and Alexander Dekhtyar (“Dekhtyar”), collectively (“Defendants”), by and through their counsel of record Marquis Aurbach, and plaintiff Blue Water Petroleum Corp. (“BWPC” or “Plaintiff”) by and through their counsel The Gilmore Law Group, respectfully submit the following Stipulation and Order to Extend Defendants’ Deadline to Respond to Complaint (First Request). Parties stipulate and agree as follows:

1. Plaintiff filed its Complaint on March 1, 2024 in the Second Judicial District Court of the State of Nevada, County of Washoe. Defendants’ counsel accepted service of the Complaint on April 26, 2024. Defendants’ current responsive deadline is May 17, 2024.

1 2. Plaintiff and Defendants hereby stipulate and jointly request that the deadline for
2 Defendants to respond to Plaintiff's complaint be extended by two (2) weeks to **May 31, 2024**.
3 This stipulation and order is submitted in good faith and not for purposes of delay.

4 Dated this 20th day of May, 2024

5 **MARQUIS AURBACH**

6 By:/s/ *Alexander K. Calaway*

7 Chad F. Clement, Esq.
8 Nevada Bar No. 12192
9 Alexander K. Calaway, Esq.
10 Nevada Bar No. 15188
11 10001 Park Run Drive
12 Las Vegas, NV 89145
13 Attorney for Defendants

Dated this 20th day of May, 2024

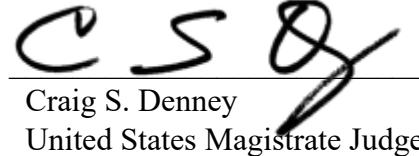
THE GILMORE LAW GROUP PLLC

By:/s/ *Frank C. Gilmore*

Frank C. Gilmore, Esq.
Nevada Bar No.10052
3715 Lakeside Drive
Reno, Nevada 89509
Attorneys for Plaintiff

12 **ORDER**

13 DATED: May 20, 2024

14 
15 Craig S. Denney
16 United States Magistrate Judge

MARQUIS AURBACH CHTD.

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816